



December 7, 2021

Patrick Allen, Director
Jeremy Vandehey, Health Policy & Analytics Division Director
Oregon Health Authority
500 Summer Street NE, E-20
Salem, OR 97301

Director Allen and Director Vandehey,

Thank you for the opportunity to provide comment on rulemaking for the Health Care Market Oversight program. Without an adequate health care workforce in Oregon, access to essential health services is severely limited – the pandemic has clearly shown us this. Training capacity at Oregon’s educational institutions depends directly on the clinical training capacity in health care settings across the state. Oregon will not be able to meet the health care needs of the people in our state without ensuring adequate training opportunities for tomorrow’s providers.

As higher education institutions responsible for training the next generation of health care providers in Oregon, we respectfully request that OHA include the following language to ensure clinical training opportunities are prioritized and preserved during material change transactions.

OAD 409-070-0010 (3) (b) A reduction in the number of providers, including the number of culturally competent providers, health care interpreters, traditional healthcare workers, or clinical experiences or training opportunities for individuals enrolled in a professional clinical education program.

Clinical training is a vital and required component of the clinical education process that allows students to gain experience and develop clinical competencies while being supervised by preceptors. Preceptors are practicing health care professionals who teach students in the clinical settings in which they practice, providing feedback to students on their progress and performance in hands-on clinical care.

Training the next generation of health care providers has been a long-standing duty of the nation’s health care system, however that altruistic tradition is under significant pressure. Oregon, and the

nation, has operated in a highly constrained preceptor environment for all health professions students for many years – a situation that has only worsened as a result of the COVID pandemic. While a multifactorial issue, one reason clinical placement sites and preceptors are constrained is consolidation in the health care industry, which decreased the number of clinical education sites available and reduced training capacity. For example, in 2018, an out-of-state corporation bought out a practice in Bend that regularly hosted clinical training for many Oregon students, and now there are very few clinical learning opportunities available at that site.

Two of the stated goals of the Health Care Market Oversight program are protecting access to essential health services and advancing health equity. Clinical training in rural and underserved communities is vital to meet these goals. Clinical training has a significant impact on where and how a provider ultimately chooses to practice. Students are more likely to practice where they train, which makes the preservation of training opportunities at clinical sites in racially, socially, or economically underserved communities a critical component of preserving equitable access to health care. Requiring health care entities to consider the impact to training programs of a material change transaction is imperative to preventing reductions in the number of providers in Oregon’s most vulnerable communities.

We ask, at a minimum, that clinical experiences and training opportunities not be reduced as a result of health care transactions, but OHA could also consider including the maintenance or expansion of clinical education opportunities as a demonstration of positive impact from a material change transaction given the incredible value these opportunities have for the communities where they take place to grow the number of high quality providers practicing there.

We appreciate your consideration of this critical issue. Should you require any additional information, please reach out to Ellie Boggs at (541) 223-1906 or boggs@ohsu.edu.

Sincerely,

Bushnell University

Linfield University

Oregon Alliance of Independent Colleges and Universities

Oregon Community College Association

Oregon Health & Science University

Oregon Institute of Technology

Pacific University

Southern Oregon University

University of Western States

Warner Pacific University

Western Oregon University

References

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